



# Keep Coyote Creek Beautiful

Working Together for a Vibrant Coyote Creek

July 7, 2015

TO: Bruce Wolfe, Executive Officer  
& San Francisco Regional Water Quality Control Board Members

RE: July 8 Board meeting agenda #6: Municipal Regional Stormwater NPDES Permit Tentative Order

Over the past year, my community group of volunteers has worked closely with the City of San José to remove trash that has accumulated over the past 30+ years in Coyote Creek. Working a 4-mile section, we've held 13 creek cleanup events with over 3,000 volunteer hours removing nearly 40 tons of trash from this creek. The City has been a key partner and provided many direct services related to these events, such as supplies, staff, and trash collection. We greatly appreciate the City's support, and will continue our work this coming fiscal year through a partnership grant.

I write today to support the changes that the City is requesting regarding the Tentative Order, specifically around the value of offsets for load reduction benefits and for creek cleanups. I learned of the values for these items and believe they are too low. These number should more accurately reflect the value of the sustained volunteer time and effort to remove trash from the streets and waterways of our communities, and for the need for flexibility in accounting:

1. Increase the maximum offset for robust programs addressing creek cleanups to 10% and direct discharges to 25%. The current 5% offset listed at C.10.e. is much too low when you consider the value of the volunteer hours.
2. Reduce the ratio of trash removed to a reduction value to 3:1, similar to other types of mitigation programs. The current 10:1 level is way too high.
3. Remove the requirement for a minimum cleanup frequency of two times a year at each specific cleanup location. Working Coyote Creek, the trash flows with the water, so limiting the "site" location and cleanup frequency is inflexible. We know that removing trash from the streets and creeks, regardless of its location, is the most important element of the cleanups.

Thank you for considering these comments.

Deb Kramer  
Keep Coyote Creek Beautiful Program Manager